

1 GEORGE P. KELESIS, ESQ.
Nevada State Bar No. 000069
2 BAILUS COOK & KELESIS, LTD.
400 South Fourth Street, Suite 300
3 Las Vegas, Nevada 89101
Phone: (702) 737-7702
4 Fax: (702) 737-7712
E-mail: law@bckltd.com
5 *Attorneys for Theodore Lee*

6 JEREMY N. HENDON
Trial Attorney, Tax Division
7 U.S. Department of Justice
P.O. Box 683
8 Ben Franklin Station
Washington, D.C. 20044-0683
9 Telephone: (202) 353-2466
Facsimile: (202) 307-0054
10 Jeremy.Hendon@usdoj.gov

11
12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 * * * *

16 THEODORE F. LEE,

17 Petitioner,

18 v.

19 UNITED STATES OF AMERICA,

20 Respondent.

Case No. 2:13-cv-00483-RCJ-PAL

JOINT STATUS REPORT

21 Petitioner, Theodore Lee ("Lee"), and Respondent, United States of America ("United
22 States"), by and through their respective counsel of record, hereby submit this Joint Status Report
23 as required by the Court's January 18, 2014 Order and represent as follows:

24 Since filing the last status report on January 3, 2014, the Government has agreed that
25 based on the documentation produced, it will no longer seek an Order to Show Cause relative to
26 the summons enforcement action, *USA v. Lee*, Case No. 2:12-cv-01994-GMN-PAL. As
27 discussed in the parties' previous Joint Status Reports, resolution of the summons enforcement
28 action will likely resolve the document production issues in this action.

1 The parties are in the process of negotiating the language of a stipulated resolution of the
2 both matters and require one additional week to do so. In the event the parties have not filed a
3 stipulation dismissing this action by March 7, 2013, then they will file a Joint Status Report.

4 This parties file this Joint Status Report and Stipulation to Stay in good faith and not for
5 the purposes of delay.

6 Respectfully submitted this 27th day of February, 2014.

7 BAILUS COOK & KELESIS, LTD.

KATHRYN KENEALLY
Assistant Attorney General

8 /s/ George P. Kelesis

/s/ Jeremy N. Hendon

9 GEORGE P. KELESIS, ESQ.
10 Nevada Bar No. 000069
400 South Fourth Street, Suite 300
Las Vegas, Nevada 89101
11 *Counsel for Theodore Lee*

JEREMY N. HENDON
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Ben Franklin Station
Washington, D.C. 20044-0683
12 *Counsel for the United States of America*

13 DANIEL G. BOGDEN
14 United States Attorney
District of Nevada
15 of Counsel

1 GEORGE P. KELESIS, ESQ.
Nevada State Bar No. 000069
2 BAILUS COOK & KELESIS, LTD.
400 South Fourth Street, Suite 300
3 Las Vegas, Nevada 89101
Phone: (702) 737-7702
4 Fax: (702) 737-7712
E-mail: law@bckltd.com
5 *Attorneys for Theodore Lee*

6 JEREMY N. HENDON
Trial Attorney, Tax Division
7 U.S. Department of Justice
P.O. Box 683
8 Ben Franklin Station
Washington, D.C. 20044-0683
9 Telephone: (202) 353-2466
Facsimile: (202) 307-0054
10 Jeremy.Hendon@usdoj.gov

11
12
13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 * * * *

16 THEODORE F. LEE,

17 Petitioner,

18 v.

19 UNITED STATES OF AMERICA,

20 Respondent.

Case No. 2:13-cv-00483-RCJ-PAL

ORDER
[Proposed]

21 Upon consideration of the Joint Status Report, and for good cause shown:

22 IT IS HEREBY ORDERED that the above-caption action be stayed and the parties shall
23 file a Joint Status Report on or before October 9, 2014 in the event the matter is not
24 resolved and a Stipulation to Dismiss the action filed before that date.

25 DATED this 5th day of October, 2014.

26
27 
28 UNITED STATES JUDGE